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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS FINANCIAL  
SERVICES, INC.,

Plaintiff,

v.

ARTHUR KUPPERMAN, E. ROSS BROWNE,  
PAULETTE KRELMAN, PGB  
INTERNATIONAL, LLC, and JPMORGAN  
CHASE BANK, N.A.,

Defendants,

and

IFIG USA, INC., JOHN DOES (1-10) and ABC  
CORPORATIONS (1-10),

Additionally Defendants  
on the Crossclaim.

CIVIL ACTION

Civil Action No. 06-4802 (DMC)

**ANSWER TO CROSSCLAIMS FOR  
CONTRIBUTION AND  
INDEMNIFICATION**

Defendant JPMorgan Chase Bank, N.A. ("Chase"), by way of answer to the crossclaims for contribution (including contribution under the Guarantees) and indemnification asserted by defendant IFIG USA, Inc. in its Answer to the Amended Crossclaim of JPMorgan Chase Bank, N.A. (filed at docket no. 250), responds as follows:

**ANSWER TO CROSSCLAIM FOR CONTRIBUTION**

The crossclaim for contribution contains legal conclusions to which no response

is required. To the extent a response is required, Chase denies the allegations contained in the crossclaim for contribution.

**ANSWER TO CROSSCLAIM FOR CONTRIBUTION UNDER THE GUARANTEES**

The crossclaim for contribution under the guarantees contains legal conclusions to which no response is required. To the extent a response is required, Chase denies the allegations contained in the crossclaim for contribution under the guarantees.

**ANSWER TO CROSSCLAIM FOR INDEMNIFICATION**

The crossclaim for indemnification contains legal conclusions to which no response is required. To the extent a response is required, Chase denies the allegations contained in the crossclaim for indemnification.

**AFFIRMATIVE DEFENSES**

Chase hereby incorporates by reference and asserts each and every affirmative defense which is set forth in Chase's answer, counterclaim and crossclaims, filed at docket no. 67, as a defense to the crossclaims for contribution and indemnification asserted by IFIG.

**WHEREFORE**, Chase demands judgment against IFIG dismissing all crossclaims for contribution and indemnification, awarding legal fees and costs of suit, and granting such other and further relief as this Court may deem just and equitable.

HERRICK, FEINSTEIN LLP  
Attorneys for JPMorgan Chase Bank, N.A.

By: /s/ John M. August  
John M. August

Dated: February 21, 2008